

From: Michael Boccadoro [mailto:mboccadoro@dolphingroup.org]

Sent: Thursday, June 03, 2010 12:37 PM

To: Lester Snow; Grindstaff, Joe@DeltaCouncil; John Moffatt

Subject: Striped Bass

Just wanted to make sure you saw the most recent letter to CDFG on striped bass from NMFS. Very powerful letter. Does anyone in the administration think this is a priority and maybe deserves some action? This is going to go public very soon since the lawsuit is being heard next week in Wanger's court. Fish and Game does not seem to have their act together. I would very much like to get a response on this.

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Attachment

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UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Sacramento Area Office
650 Capitol Mall, Suite 8-300
Sacramento, California 95814-4706

May 13, 2010

Mr. Jim Kellogg
President, California Fish and Game Commission
1416 Ninth Street
P.O. Box 944209
Sacramento, California 94244-2090

Dear Mr. Kellogg:

The purpose of this letter is to follow up on the California Fish and Game Commission (Commission) meeting held on April 7, 2010, in Monterey, CA. One of the agenda items at that meeting pertained to the Commission's consideration and direction to staff regarding a possible amendment to striped bass sport fishing regulations. NOAA's National Marine Fisheries Service (NMFS) is concerned about the impacts that non-native predators such as striped bass are having on native anadromous salmonids in the Central Valley. The public draft recovery plan for Sacramento River winter-run Chinook salmon, Central Valley spring-run Chinook salmon, and Central Valley steelhead has identified non-native predation as a key factor contributing to the precarious status of these species (see executive summary page 2; pages 4, 19, 36, 48, and 157 in the main document, and pages 33-35, and 40 in Appendix B).

We understand the Commission has a broad interest in taking a comprehensive view of all stressors affecting native fish that are listed as threatened or endangered under the State and Federal Endangered Species Acts. In this regard, we would be happy to provide a presentation to the Commission on those stressors and their associated effects on the three species covered under the Central Valley salmon and steelhead recovery plan.

With respect to striped bass, NMFS encourages the Commission to immediately review and amend striped bass sport fishing regulations in an attempt to reduce their predatory impact and thereby increase survival of native fish. Our recommendation are as follows:

Geographic Areas:

All anadromous waters of the Central Valley, including the Sacramento River and its major tributaries, the Sacramento/San Joaquin River Delta, the San Joaquin River and its major tributaries, and San Francisco Bay.

Open Season:

Year-round



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Minimum Size:

No minimum size limit

Bag Limit:

No bag limit

We are aware that striped bass have co-existed with salmon and steelhead in the Central Valley since striped bass were introduced in 1879. Given the population crashes of salmon and steelhead that occurred as the region was developed; however, and the current serious declines in salmon stocks that are already threatened or endangered, it is necessary to reexamine the ecosystem effects of maintaining a striped bass sport fishery. In our review of the available literature regarding striped bass predation on native fish, NMFS has concluded that striped bass predation on salmon and steelhead is an important stressor warranting action. Some key points from that we would like to highlight include:

- Hanson (2009): *"Striped bass predation in rivers tributary to the Delta appears to be the largest single cause of mortality of juvenile salmon migrating through the Delta. The high rates of striped bass predation within the Sacramento River are supported by, inter alia, striped bass diet studies and recent survival studies that have shown high mortality of salmon and steelhead – approximately 90%-before they reach the Delta."*
- DWR (2008): *"In 2007, the PIT tagged steelhead pre-screen loss rate within Clifton Court Forebay was between 77 ±4% and 82 ±3% (Mean ±95% Confidence Interval)." Much of this loss is presumably striped bass predation based on striped bass abundance and behavior information obtained during the study.*
- Lindley and Mohr (2003): *"According to our analysis, the current striped bass population of roughly 1×10^6 adults consumes about 9% of winter-run chinook salmon outmigrants."*
- Gingras (1997): *"Pre-screen loss estimates for juvenile Chinook salmon were 63-99%." "Predation by adult and subadult striped bass may account for much of the pre-screen loss."*

Salmon and steelhead are experiencing sharp declines as a result of the cumulative effects and interactions of multiple stressors. Actions to address stressors such as Delta water withdrawals and ocean harvest are being taken. We believe it is necessary to address the full range of stressors if we are to recover these species, including a concentrated effort to reduce predation by non-native species.

Sincerely,



Maria Rea
Sacramento Area Office Supervisor

NMFS-PRD, Long Beach, CA

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